

**VIEWS OF BRAZIL ON THE IMPLEMENTATION OF ALL THE ELEMENTS OF  
DECISION 1/CP.17, MATTERS RELATED TO PARAGRAPHS 7 AND 8  
(WORKSTREAM 2), ON THE WORK OF THE AD HOC WORKING GROUP ON  
THE DURBAN PLATFORM FOR ENHANCED ACTION**

**Incentives for the promotion of early action under the Convention**

1. The Government of Brazil welcomes the opportunity to submit views regarding the implementation of all the elements of decision 1/CP.17, matters related to paragraphs 7 and 8, in the context of the work of the Ad Hoc Working Group on the Durban Platform for Enhanced Action (“workstream 2”).<sup>1</sup>

2. It is the understanding of Brazil that workstream 2 offers an opportunity to promote additional emissions reduction results during the pre-2020 period, with a view to reaching the ultimate objective of the Convention to stabilize greenhouse gas concentrations in the atmosphere at a level that would prevent dangerous anthropogenic interference with the climate system.

3. In the view of the Brazilian government, the development of the 2015 agreement under workstream 1 of the Durban Platform will be key for providing the full, effective and sustained implementation of the Convention and for strengthening the multilaterally agreed rules-based system. Nonetheless, the prospect of the adoption of a new instrument under the Convention to be implemented from 2020 may pose the risk of a perverse incentive of stimulating countries not to act before 2020, so that their domestic mitigation potential could be in the longer term, when stricter commitments are expected to be required from all.

4. Brazil believes that such a risk must be avoided, especially because actions will contribute more to keeping the global temperature increase below 2° C the earlier they are undertaken. It is the Brazilian position that the Conference of the Parties (COP) must act to promote early action, under workstream 2, by means of permitting early actions also to be translated into the fulfillment of future commitments under the 2015 agreement.

**Benefits of early-action in relation to reducing temperature increase**

5. It is widely recognized by Science<sup>2</sup> that, due to the double accumulation process, both with respect to emissions and to the concentration of greenhouse gases in the atmosphere, early mitigation is more effective in reducing global temperature increase in the long-term than if undertaken in a later stage. Emissions reductions will contribute more to the fight against climate change the earlier they are delivered.

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<sup>1</sup> Decision 1/CP.17 (Establishment of an Ad Hoc Working Group on the Durban Platform for enhanced action), paragraph 2.

<sup>2</sup> The Double accumulation process is consensual in climate change physics, and has been considered in all of the Assessment Report of the Intergovernmental Panel on Climate Change (IPCC).

6. Brazil believes that pre-2020 actions that present quantifiable additional emissions reductions under the Convention and its Kyoto Protocol should also be recognized in the context of the 2015 agreement, in order to promote action under workstream 2, in a mutually supportive manner in relation to workstream 1. To this extent, early-actions undertaken before 2020, recognized as such under the Convention and its Kyoto Protocol, should be accounted for the achievement of Parties commitments during the post-2020 period. This would ensure that complementary actions are implemented respecting the requirements of environmental integrity, while strengthening the political process for the development of the new instrument.

7. International recognition of early action would greatly contribute to closing the ambition gap before 2020, while facilitating the fulfillment of Parties commitments after 2020.

### **Recognition of early-action in the context of the 2015 agreement**

8. Brazil proposes that voluntary nationally appropriate mitigation actions communicated to the UNFCCC by non-Annex I Parties, as well as actions that are supplementary to communicated quantified economy-wide emission reduction targets by Annex I Parties, should be accounted for the achievement of commitments under the 2015 agreement, provided that they have delivered concrete additional emissions reduction results before 2020. This would stimulate all countries to immediately enhance their level of ambition in the pre-2020 period, while avoiding the perverse incentive of leading countries to take the political decision not to enhance domestic action until the final definition of the 2015 agreement and its entry into force from 2020.

9. In this sense, actions to be accounted for in the new instrument should be communicated both by Annex I and non-Annex I Parties to the Secretariat specifically for recognition as early-action. Communicated actions would receive such recognition provided that they have resulted in quantified emissions reductions that are additional to emissions reductions from policies that were already in place before 2009. In the case of Annex I Parties, emissions reduction results should be additional to what they have committed to under the Cancun Agreements and to QELROs inscribed for the second commitment period, in order to be recognized as early-action. Units arising from the mechanisms under the Kyoto Protocol (including AAUs, CERs and ERUs) that are voluntarily cancelled should be similarly accounted for under the 2015 agreement, including AAUs cancelled as a result of the ambition mechanism that was established by CMP-8, in Doha.

10. Only quantified emissions reductions from specific actions undertaken by Parties should be recognized as early-action. Early-action should translate real, projected and intended mitigation efforts by a Party. It should not derive from specific unintended circumstances, including from economic downturns and natural events.

### **Accounting early-action in the context of the 2015 agreement**

11. Actions recognized as early-action should be taken into account in the definition and assessment of a Party's contribution or quantified emissions reduction or limitation objective for the post-2020 period. The quantified emissions reduction results arising from

early-action should be accounted for the fulfillment of its post-2020 commitments under the new instrument. Such emissions reductions from early-action before 2020 by a Party would be used to facilitate the achievement of its own mitigation objective after 2020, and stimulate even more ambition.

12. The increase of ambition of QELROs under the second commitment period through the newly established ambition mechanism of the Kyoto Protocol should also be stimulated and recognized as early-action. AAUs that are cancelled as a result of the actual decrease of QELROs inscribed under the Kyoto Protocol for the second commitment period should be also accounted for under the 2015 agreement. Other Kyoto units, including CERs from the Clean Development Mechanism and ERUs from Joint Implementation, which are voluntarily cancelled by a Party should equally be added to its contribution under the new instrument. This would promote an overall increase of demand for those mechanisms, further providing additional fully verified emissions reductions in the short-term.

13. Assurance that early supplementary emissions reduction results would be carried-over to the post-2020 period under the 2015 agreement for domestic use would greatly promote pre-2020 ambition. This would foster immediate actions by all countries that would otherwise be undertaken in a later stage. Recognition of early action would favor the creation of “green air” that could significantly contribute to closing the ambition gap in the short-term and to the 2° C goal in the longer-term.

#### **Proposed decision by COP-19**

14. Brazil believes that it would be important that the Conference of the Parties provide clear political assurance in that respect, in order to immediately trigger the consideration of how Parties could undertake voluntary early actions and consequently enhance their pre-2020 ambition level. Brazil proposes, to this extent, that COP-19, in Warsaw, adopts a decision recognizing that early action during the pre-2020 period will be accounted for under the 2015 agreement.